

**T H E  
CHANDRA  
L A W F I R M L L C**

1265 West 6th Street, Suite 400  
Cleveland, Ohio 44113-1326  
United States

# INVOICE

Invoice # 1175  
Date: 08/21/2018  
Due Upon Receipt

Sabrina Robinson

## J.G. and D.J. v. Jones, et al.

Date	Attorney	Notes	Quantity	Rate	Total
11/16/2016	Ashlie Sletvold	Draft public-records requests to City and Library.	0.40	\$400.00	\$160.00
11/30/2016	Ashlie Sletvold	Discussion with M. Brown regarding response from Lakewood to public-records request. (0.1 hours waived)	0.10	\$400.00	\$0.00
12/02/2016	Subodh Chandra	Meeting with J.G., her parents, and M. Brown.	2.00	\$500.00	\$1,000.00
12/02/2016	Marvin Brown	Meet with S. Chandra, J.G., and parents. (2 hours waived)	2.00	\$265.00	\$0.00
12/06/2016	Subodh Chandra	Discussion with P. Kirsanow, counsel for Lakewood Public Library, re obtaining access to video of incident. Attention to update from City of Lakewood to personnel-file public-records requests.	0.20	\$500.00	\$100.00
12/11/2016	Subodh Chandra	Attention to communications of assistant law director in response to public-records requests.	0.10	\$500.00	\$50.00
12/12/2016	Subodh Chandra	Communications with M. Brown and A. Sletvold re additional public-records requests.	0.10	\$500.00	\$50.00
12/22/2016	Marvin Brown	Reviewed personnel files provided by Lakewood.	0.50	\$265.00	\$132.50
12/23/2016	Subodh Chandra	Meeting with D.J. and his parents. Communications with P. Kirsanow, Lakewood Public Library counsel.	1.70	\$500.00	\$850.00
12/23/2016	Marvin Brown	Meeting with D.J. and his parents. Drafted Monell public-records request complaint. (2.0 hours waived)	2.00	\$265.00	\$0.00

01/03/2017	Marvin Brown	Drafting complaint and reviewed police body camera footage.	1.10	\$265.00	\$291.50
01/03/2017	Subodh Chandra	Review and discuss with co-counsel body-cam video from officers with M. Brown; further discussion regarding obtaining library video, potential defendants.	0.80	\$500.00	\$400.00
01/05/2017	Marvin Brown	Reviewed personnel file of Kevin Jones, spoke with T. Pavlish for investigation with J. Greenwood, coordinated investigation with S. Robinson, and continued drafting complaint.	2.90	\$265.00	\$768.50
01/06/2017	Subodh Chandra	Communications regarding information sent by client family and continued efforts by M. Brown to obtain video from library. (0.1 hours waived)	0.10	\$500.00	\$0.00
01/06/2017	Marvin Brown	Continued drafting complaint; reviewed recently received medical records from MetroHealth; sent email to Lakewood Library counsel, P. Kirsanow, with the requested family waiver to obtain video.	3.00	\$265.00	\$795.00
01/08/2017	Marvin Brown	Reviewed public-records request from Lakewood and continued drafting complaint.	3.30	\$265.00	\$874.50
01/09/2017	Marvin Brown	Continued drafting complaint. (1.3 hours waived)	1.30	\$265.00	\$0.00
01/12/2017	Ashlie Sletvold	Return call to insurance adjuster, S. Schroler.	0.30	\$400.00	\$120.00
01/24/2017	Ashlie Sletvold	Discussion with insurance adjuster, S. Schroler, regarding access to video and presuit resolution; update co-counsel on discussion.	0.10	\$400.00	\$40.00
01/24/2017	Subodh Chandra	Attention to update re J.G. deteriorating PTSD condition and hospitalization. Attention to A. Sletvold communications with Lakewood insurance adjuster. (0.1 hours waived)	0.10	\$500.00	\$0.00
02/21/2017	Marvin Brown	Met with Lakewood counsel J. Swallow to view library surveillance videotapes; discussed case with A. Sletvold and S. Chandra.	2.50	\$265.00	\$662.50
03/02/2017	Marvin Brown	Started drafting protective order and call to S. Robinson. (0.6 hours waived)	0.60	\$265.00	\$0.00
03/03/2017	Marvin Brown	Drafted confidentiality agreement for mediation.	1.50	\$265.00	\$397.50
03/07/2017	Ashlie Sletvold	Review/revise draft mediation-confidentiality agreement; communicate with M. Brown and S. Chandra regarding same.	0.50	\$400.00	\$200.00
03/08/2017	Marvin Brown	Incorporated A. Sletvold's edits to confidentiality agreement. (1.6 hours waived)	1.60	\$265.00	\$0.00

03/15/2017	Subodh Chandra	Tel. call with Jennifer Swallow, Lakewood Assistant Law Director, returning call to Director of Law Kevin Butler. Delegate drafting task to M. Brown.	0.20	\$500.00	\$100.00
03/17/2017	Subodh Chandra	Discussion with M. Brown. Edit and add content to letter to law director Butler re public-records demand and potential mediation.	0.50	\$500.00	\$250.00
03/21/2017	Ashlie Sletvold	Discussion with P. Kirsanow and M. Brown regarding public-records request; discussion with M. Brown regarding pursuing court of claims matter for non-compliance. (0.2 hours waived)	0.20	\$400.00	\$0.00
03/22/2017	Ashlie Sletvold	Review authority provided by library counsel regarding images of minors; legal research regarding same; respond to email from library counsel; update Lakewood counsel regarding library dispute over video; discussion with S. Chandra regarding earlier discussion with J. Swallow.	0.30	\$400.00	\$120.00
03/23/2017	Marvin Brown	Prepared Court of Claims filing against Lakewood library for failing to timely provide surveillance videos. (0.5 hours waived)	0.50	\$265.00	\$0.00
03/24/2017	Subodh Chandra	Communications with law director and co-counsel re videos and mediation.	0.20	\$500.00	\$100.00
03/24/2017	Marvin Brown	Organized retrieval of videos from Lakewood and reviewed videos.	1.00	\$265.00	\$265.00
03/24/2017	Ashlie Sletvold	Call to J. Swallow re failure to provide video; review emails with K. Butler regarding producing video; review meritless objections to providing video from P. Kirsanow.	0.20	\$400.00	\$80.00
03/29/2017	Marvin Brown	Spoke with clients father and organized a time to review the videos. (0.1 hours waived)	0.10	\$265.00	\$0.00
04/03/2017	Ashlie Sletvold	Meet with J.G. parents to review portions of surveillance videos; discussions with co-counsel regarding additional public records.	1.00	\$400.00	\$400.00
04/03/2017	Marvin Brown	Reviewed library surveillance videos with J.G. parents. (1.2 hours waived)	1.20	\$265.00	\$0.00
04/04/2017	Marvin Brown	Drafted public-records request to Lakewood.	0.20	\$265.00	\$53.00
04/05/2017	Ashlie Sletvold	Review draft public-records requests and provide feedback to M. Brown.	0.20	\$400.00	\$80.00
04/14/2017	Subodh Chandra	Edit draft confidential mediation agreement. Discussion with M. Brown re same and delegate transmittal and comments to Director Butler.	0.30	\$500.00	\$150.00

04/14/2017	Marvin Brown	Responded to emails from S. Chandra on mediation process; updated Ms. Robinson on case status; reviewed and updated confidentiality agreement.	0.50	\$265.00	\$132.50
04/17/2017	Ashlie Sletvold	Discussion with co-counsel regarding mediation overtures. (0.1 hours waived)	0.10	\$400.00	\$0.00
05/19/2017	Marvin Brown	Edited confidentiality agreement and emailed to opposing counsel.	0.20	\$265.00	\$53.00
05/23/2017	Marvin Brown	Worked on draft complaint; spoke with Ms. Robinson to update her family on the current status. (2.5 hours waived)	2.50	\$265.00	\$0.00
05/24/2017	Marvin Brown	Continued working on drafting the complaint.	1.00	\$265.00	\$265.00
05/25/2017	Ashlie Sletvold	Discussion with M. Brown regarding library request for additional time to consider mediation proposal; discussion of library liability. (0.1 hours waived)	0.10	\$400.00	\$0.00
05/25/2017	Subodh Chandra	Editing complaint for M. Brown. (0.5 hours waived)	0.50	\$500.00	\$0.00
05/30/2017	Ashlie Sletvold	Return call to library insurer. (0.1 hours waived)	0.10	\$400.00	\$0.00
06/01/2017	Subodh Chandra	Attention to correspondence with counsel for library re potential mediation and failure to insurance representative to respond; weigh in on same. Complaint brainstorming/strategy meeting with M. Brown and A. Sletvold.	1.00	\$500.00	\$500.00
06/01/2017	Marvin Brown	Researched failure-to-train claim under the facts; revised complaint. (2 hours waived)	4.00	\$265.00	\$530.00
06/01/2017	Subodh Chandra	Attention to correspondence with counsel for library re potential mediation and failure to insurance representative to respond; weigh in on same. Complaint brainstorming/strategy meeting with M. Brown and A. Sletvold.	1.00	\$500.00	\$500.00
06/01/2017	Subodh Chandra	Attention to correspondence with counsel for library re potential mediation and failure to insurance representative to respond; weigh in on same. Complaint brainstorming/strategy meeting with M. Brown and A. Sletvold.	1.00	\$500.00	\$500.00
06/05/2017	Subodh Chandra	Revisions to and discussions with co-counsel re strategies on causes of action in complaint. Delegate complaint filing. Tel. call to Mrs. Robinson. (2.8 hours waived)	2.80	\$500.00	\$0.00
06/05/2017	Ashlie Sletvold	Review/revise draft complaint; discussions with co-counsel regarding status and strategy; review and discuss email from City again	5.00	\$400.00	\$2,000.00

		requesting additional time; call with S. Robinson; finalize materials for filing.			
06/05/2017	Marvin Brown	Edited and helped file complaint. (2.9 hours waived)	2.90	\$265.00	\$0.00
06/06/2017	Subodh Chandra	Attention to docket entries. Attention to witness information.	0.70	\$500.00	\$350.00
06/07/2017	Tyra Robinson	Phone interview with Eric Deamer and write-up of the interview. (0.8 hours waived)	0.80	\$150.00	\$0.00
06/07/2017	Subodh Chandra	Attention to information provided by witness. Delegate witness interview to law clerk. Attention to report of witness interview.	0.30	\$500.00	\$150.00
06/07/2017	Ashlie Sletvold	Discussion with S. Chandra regarding witness with past interaction with K. Jones at Library; discussions of division of labor for follow-up public-records requests. (0.2 hours waived)	0.20	\$400.00	\$0.00
06/13/2017	Tyra Robinson	Drafting public-records requests to City of Lakewood Library, City of Lakewood Police Department and City of Cleveland. (3.5 hours waived)	3.50	\$150.00	\$0.00
06/14/2017	Subodh Chandra	Attention to information regarding potential expert. Delegate follow-up to colleague. (0.1 hrs waived.)	0.10	\$500.00	\$0.00
06/14/2017	Patrick Haney	Discuss protective order with T. Robinson and direct her to model language. (0.2 hours waived)	0.20	\$295.00	\$0.00
06/15/2017	Tyra Robinson	Revising public-records requests to City of Lakewood Public Library, City of Lakewood Police Department and City of Cleveland. (1.2 hours waived)	1.20	\$150.00	\$0.00
06/16/2017	Tyra Robinson	Revising proposed stipulated protective order and motion for entry. (3.5 hours waived)	3.50	\$150.00	\$0.00
06/19/2017	Subodh Chandra	Discussions re anonymous call information, public-records information, and inquiry from Medicare.	0.20	\$500.00	\$100.00
06/21/2017	Subodh Chandra	Attention to reports re mayoral comments on case and consideration of evidentiary avenues presented by the same.	0.50	\$500.00	\$250.00
06/22/2017	Marvin Brown	Reviewed protective order and public-record requests to Lakewood.	1.00	\$265.00	\$265.00
06/22/2017	Subodh Chandra	Attention to communications among counsel re waivers of service and appearances; communications with co-counsel re additional fact investigation needed.	0.20	\$500.00	\$100.00

06/23/2017	Marvin Brown	Reviewed and sent out public-records requests.	0.90	\$265.00	\$238.50
06/23/2017	Ashlie Sletvold	Discussion with library counsel; send service waiver and mediation proposal; direct paralegal regarding transmitting video; update S. Chandra and M. Brown on discussion; direct M. Brown regarding collection of medical expenses and updated insurance picture. (0.7 hours waived)	0.70	\$400.00	\$0.00
06/23/2017	Brian Bardwell	Library phone call. (0.3 hours waived)	0.30	\$150.00	\$0.00
07/11/2017	Subodh Chandra	Read letter from counsel for Lakewood library agreeing to mediation and requesting documents; discussion with co-counsel re merits of requests; tel. calls and messages to City of Lakewood law director Kevin Butler and outside counsel Jim Climer. Tel. call with Climer and A. Sletvold re mediation, need for stipulated protective order, document exchange. (.3 hours waived)	0.30	\$500.00	\$0.00
07/14/2017	Ashlie Sletvold	Review/revise draft stipulated protective order, motion for entry, and motion to continue CMC and stay deadlines pending mediation; discussion with M. Brown regarding drafts.	0.40	\$400.00	\$160.00
07/17/2017	Ashlie Sletvold	Discussion with M. Brown regarding timing of follow up to defense counsel regarding mediation. (0.1 hours waived)	0.10	\$400.00	\$0.00
07/19/2017	Ashlie Sletvold	Discussion with M. Brown regarding defense counsel's failure to follow up and our need to collect educational and dental records; call to C. O'Sullivan regarding mediation. (0.2 hours waived)	0.20	\$400.00	\$0.00
07/19/2017	Marvin Brown	Spoke to S. Robinson regarding collecting records requested by defense for mediations; started prep for document collection; called schools for information on collecting personal records; emailed opposing counsel and conferred internally with A. Sletvold and S. Chandra on next steps)	2.00	\$265.00	\$530.00
07/24/2017	Ashlie Sletvold	Discussion with M. Brown regarding coordinating with defense counsel regarding joint motions for protective order and to continue CMC pending mediation; review library's motion to excuse presence of lead counsel at CMC.	0.20	\$400.00	\$80.00
07/25/2017	Marvin Brown	Called and emailed educational institutions to obtain academic records requested by defense for mediation.	1.40	\$265.00	\$371.00

07/27/2017	Subodh Chandra	Attention to correspondence among counsel regarding protective order, in particular opposing counsel for Lakewood balking at agreeing to the Court's own stipulated protective order form. Conferral among co-counsel re how to handle this odd behavior. Directives regarding same.	0.20	\$500.00	\$100.00
07/27/2017	Ashlie Sletvold	Review email traffic on protective order; discussions internally re Lakewood counsel resistance to N.D. Ohio standard form. (0.2 hours waived)	0.20	\$400.00	\$0.00
07/28/2017	Marvin Brown	Began draft of 26(f) motion and spoke to opposing counsel about joint motion for a continuance.	0.90	\$265.00	\$238.50
07/29/2017	Subodh Chandra	Communications with Marvin Brown re his coordination with various opposing counsel about stipulated protective order. (0.1 hours waived)	0.10	\$500.00	\$0.00
08/01/2017	Ashlie Sletvold	Discussion with M. Brown re arranging mediation with M. Ungar; discussion of outstanding public-records request responses from Library and City; reach out to Ungar's office for October mediation dates.	0.20	\$400.00	\$80.00
08/01/2017	Marvin Brown	Discuss with A. Sletvold completing public-records collection and mediation. (0.2 hours waived)	0.20	\$265.00	\$0.00
08/03/2017	Marvin Brown	Drafted responses to Cleveland and Lakewood Library regarding public-records requests.	1.00	\$265.00	\$265.00
08/04/2017	Ashlie Sletvold	Review and respond to email from J. Climer regarding mediation scheduling; respond to email from mediator's assistant regarding dates to hold and release and requesting additional options.	0.10	\$400.00	\$40.00
08/24/2017	Ashlie Sletvold	Follow up with defense counsel and mediator re dates.	0.20	\$400.00	\$80.00
08/28/2017	Ashlie Sletvold	Review and respond to emails re mediation and scheduling; review and respond to letter from C. O'Sullivan regarding records; discussion with M. Brown regarding records collection.	0.30	\$400.00	\$120.00
08/29/2017	Ashlie Sletvold	Review and respond to message from mediator's assistant, M. Crick, regarding mediation; review and respond to message from C. O'Sullivan regarding records collection and public-records response; communicate with M. Brown regarding meeting with clients;	0.20	\$400.00	\$80.00

		review message from A. Lehman re public-records response; follow-up with S. Zaranko re public-records response.			
09/06/2017	Marvin Brown	Met with clients parents to discuss next steps for mediation. (1 hour waived)	1.00	\$265.00	\$0.00
09/06/2017	Ashlie Sletvold	Meeting with J.G. and D.J. parents and M. Brown regarding status and strategy. (1.8 hours waived)	1.80	\$400.00	\$0.00
09/28/2017	Marvin Brown	Drafted joint status report to update court on mediation process.	0.50	\$265.00	\$132.50
09/28/2017	Subodh Chandra	Edit and approve draft joint status report. Communications with co-counsel regarding potential complaint amendments. (0.1 hours waived)	0.10	\$500.00	\$0.00
09/29/2017	Subodh Chandra	Review communications from opposing counsel demanding discovery and communications with co-counsel regarding status of same. (0.1 hours waived)	0.10	\$500.00	\$0.00
09/29/2017	Marvin Brown	Finalized and filed joint status report with the court; follow-up on medical and education records collection.	0.50	\$265.00	\$132.50
09/29/2017	Ashlie Sletvold	Attention to email traffic on defense demands for records, internal consult re same.	0.10	\$400.00	\$40.00
10/25/2017	Subodh Chandra	Review communications from/with opposing counsel Climer regarding medical-records production. Respond to same. Further discussion with co-counsel regarding same.	0.20	\$500.00	\$100.00
10/25/2017	Marvin Brown	Discussion with co-counsel re records collection requested by defense for mediation; further follow-up efforts to obtain compliance. 2.3 hours waived)	4.60	\$265.00	\$609.50
10/27/2017	Marvin Brown	Went to MetroHealth to attempt to collect medical records.	0.50	\$265.00	\$132.50
10/30/2017	Marvin Brown	Retrieved medical files from MetroHealth as requested by defense; reviewed MetroHealth records for D.J. and J.G.	4.80	\$265.00	\$1,272.00
10/31/2017	Ashlie Sletvold	Review of records to provide in advance of mediation per defense request; revise correspondence to accompany records delivery.	1.50	\$400.00	\$600.00
10/31/2017	Marvin Brown	Finished reviewing medical records and prepared transmission letter to defendants.	1.50	\$265.00	\$397.50
11/15/2017	Marvin Brown	Research on excessive-force claims; began drafting mediation statement.	7.20	\$265.00	\$1,908.00



11/16/2017	Marvin Brown	Continued research on excessive-force cases and qualified immunity; continued review of public-records request and drafting mediation statement.	3.50	\$265.00	\$927.50
11/27/2017	Marvin Brown	Continued drafting mediation statement; additional research re: discipline and training as to excessive-force claim.	6.50	\$265.00	\$1,722.50
11/28/2017	Ashlie Sletvold	Discussion with M. Brown regarding mediation prep; provide guidance on draft mediation statement; discussion with S. Chandra re progress on mediation prep. (0.9 hours waived)	0.90	\$400.00	\$0.00
11/28/2017	Subodh Chandra	Discussions with co-counsel re J.G. pre-mediation conference and odd position taken by Library's counsel.	0.50	\$500.00	\$250.00
11/28/2017	Marvin Brown	Discussion with A. Sletvold regarding mediation statement and continued work on same. (6.5 hours waived)	6.50	\$265.00	\$0.00
11/29/2017	Marvin Brown	Finished draft of mediation statement. (3.5 hours waived)	7.00	\$265.00	\$927.50
11/29/2017	Ashlie Sletvold	Review/revise draft mediation statement.	1.20	\$400.00	\$480.00
11/30/2017	Ashlie Sletvold	Meet with clients to prepare for mediation. (2.7 hours waived)	2.70	\$400.00	\$0.00
11/30/2017	Marvin Brown	Met with clients to discuss mediation. (1.6 hours waived)	1.60	\$265.00	\$0.00
12/03/2017	Marvin Brown	Edits to mediation statement based on discussion with clients.	2.00	\$265.00	\$530.00
12/09/2017	Subodh Chandra	Edit mediation statement. Communications with M. Ungar re same.	1.30	\$500.00	\$650.00
12/11/2017	Subodh Chandra	Prepare for tomorrow's mediation including preparation of opening mediation statement. Need to invest the time because library's counsel insisted on opening statements and asserted that he is going to make a detailed one.	1.40	\$500.00	\$700.00
12/12/2017	Marvin Brown	Mediation. (4.7 hours waived)	4.70	\$265.00	\$0.00
12/12/2017	Subodh Chandra	Mediation.	11.50	\$500.00	\$5,750.00
12/18/2017	Subodh Chandra	Post-mediation status discussion with M. Brown and need to file motion to lift the stay because of mediation failure. Review, edit, and approve motion to lift the stay.	0.10	\$500.00	\$50.00
12/18/2017	Marvin Brown	Discuss motion to lift stay with S. Chandra. Drafted same.	0.10	\$265.00	\$26.50

12/20/2017	Ashlie Sletvold	Call with C. OSullivan re library offer to resolve for \$30,000 for library; discussion with S. Chandra regarding offer. (0.6 hours waived)	0.60	\$400.00	\$0.00
12/20/2017	Subodh Chandra	Field tel. call from Corky OSullivan, counsel for Defendant Library, with nominal settlement offer of \$30,000. (0.2 hours waived)	0.20	\$500.00	\$0.00
12/29/2017	Donald Screen	Research regarding ways to minimize client exposure to setoff by non-settling defendants. (0.6 hours waived)	0.60	\$500.00	\$0.00
01/01/2018	Donald Screen	Research regarding ways to minimize client exposure to setoff by non-settling defendants. (0.4 hours waived)	0.40	\$500.00	\$0.00
01/03/2018	Marvin Brown	Spoke with S. Robinson regarding information needed for medicaid notification form; began drafting submission to obtain medicaid lien information.	0.20	\$265.00	\$53.00
01/04/2018	Donald Screen	Research regarding joint tortfeasor liability; conference with S. Chandra regarding same. (3.7 hours waived)	3.70	\$500.00	\$0.00
01/05/2018	Marvin Brown	Submitted Medicaid notices and began drafting discovery requests to all Defendants.	1.80	\$265.00	\$477.00
01/10/2018	Marvin Brown	Continued drafting discovery requests to all Defendants.	2.00	\$265.00	\$530.00
01/10/2018	Donald Screen	Research regarding liability of joint tortfeasors in section 1983 actions. (2.9 hours waived)	2.90	\$500.00	\$0.00
01/15/2018	Marvin Brown	Prepared discovery documents and CMC report of the parties planning.	3.50	\$265.00	\$927.50
01/15/2018	Subodh Chandra	Strategize with Marvin re 26(f) conference and case-management conference; tel. call with K. Melling with Mazanec and attention to M. Brown reports on efforts to reach other counsel; edit draft 26(f) report and communicate it to all counsel; review responses. Communication to opposing counsel OSullivan with Library re settlement. (1.2 hours waived)	1.20	\$500.00	\$0.00
01/20/2018	Subodh Chandra	Analyze and revise requests for production of documents, requests for admission, and interrogatories—all Defendants.	0.70	\$500.00	\$350.00
01/22/2018	Marvin Brown	Continued preparing first set of discovery requests based on edits of S. Chandra.	1.40	\$265.00	\$371.00
01/24/2018	Marvin Brown	Finalized for transmission plaintiffs' first set of discovery requests-interrogatories, production requests, and admission requests to all Defendants.	5.50	\$265.00	\$1,457.50

01/25/2018	Subodh Chandra	Receive and analyze settlement counteroffer from CNA for the Library. Communicate with clients regarding same. (0.2 hours waived)	0.20	\$500.00	\$0.00
01/26/2018	Marvin Brown	Emailed opposing counsel regarding 26(a) disclosures; spoke with clients about Medicaid authorization forms.	0.50	\$265.00	\$132.50
01/31/2018	Subodh Chandra	Review and consideration of opposing counsel C. OSullivan's latest settlement offer on Library's behalf. (0.1 hours waived)	0.10	\$500.00	\$0.00
02/01/2018	Subodh Chandra	Continued settlement negotiations with C. OSullivan for the Library. Strategize with clients and co-counsel regarding same, as well as Ohio Medicaid programs settlement-recovery expectations. (0.3 hours waived)	0.30	\$500.00	\$0.00
02/01/2018	Ashlie Sletvold	Email discussions regarding settlement communications with the library and Ohio Department of Medicaid regarding potential liens on any recovery; review correspondence from Ohio Tort Recovery Unit regarding J.G. and D.J. (0.2 hours waived)	0.20	\$400.00	\$0.00
02/05/2018	Ashlie Sletvold	Review/revise initial disclosures.	0.20	\$400.00	\$80.00
02/06/2018	Subodh Chandra	Further consideration of settlement-negotiation status with the Library. Further communications with opposing counsel C. O'Sullivan regarding same. Communications with clients regarding same. (0.2 hours waived)	0.20	\$500.00	\$0.00
02/07/2018	Ashlie Sletvold	Discussion with S. Chandra regarding call with J. Climer about settlement efforts. (0.1 hours waived)	0.10	\$400.00	\$0.00
02/07/2018	Subodh Chandra	Field tel. call from opposing counsel Jim Climer, counsel for the City regarding potential for settlement discussion with the City and the insurance carrier if certain individual defendants are dismissed at least without prejudice. Tel. call with A. Sletvold delegating further analysis.	0.20	\$500.00	\$100.00
02/12/2018	Marvin Brown	Finalized initial disclosures and letters to Medicaid personnel.	0.80	\$265.00	\$212.00
02/15/2018	Subodh Chandra	Analyze K. Melling email with disclosures and report of video recordings that were previously not produced in response to public-records requests. Consideration of same. Respond to Melling and Law Director Butler asking why these videos were withheld. Communications regarding the above with clients.	0.20	\$500.00	\$100.00

02/17/2018	Ashlie Sletvold	Review library settlement agreement. (0.9 hours waived)	0.90	\$400.00	\$0.00
02/20/2018	Subodh Chandra	Strategy discussion with M. Brown regarding settlement with library and review of video evidence regarding individual officers and potential dismissal without prejudice to facilitate settlement discussion with the City, per request of opposing counsel J. Climer. Further consideration of same and issues presented by consultation with probate counsel A. Fried. (0.3 hours waived)	0.30	\$500.00	\$0.00
02/20/2018	Marvin Brown	Discuss video evidence received regarding individual officers, requested dismissals, and next steps with S. Chandra. (0.3 hours waived)	0.30	\$265.00	\$0.00
02/21/2018	Ashlie Sletvold	Review correspondence from defense counsel regarding dismissing individual defendants; view video regarding same.	0.80	\$400.00	\$320.00
02/21/2018	Marvin Brown	Analyzed body-cam footage to analyze liability of individual officers; internal discussion regarding same. (1 hour waived)	1.00	\$265.00	\$0.00
02/21/2018	Donald Screen	Conferences with M. Brown, S. Chandra regarding strategy, requirements for settling with library; consideration of same. (0.7 hours waived)	0.70	\$500.00	\$0.00
02/21/2018	Subodh Chandra	Conference with co-counsel re request from defense counsel to dismiss individual officers to facilitate settlement. (0.7 hours waived)	0.70	\$500.00	\$0.00
02/22/2018	Subodh Chandra	Further discussions with M. Brown and A. Sletvold re stipulated dismissal of officer cases. Further outreach to A. Fried regarding library settlement. (0.2 hours waived)	0.20	\$500.00	\$0.00
02/23/2018	Marvin Brown	Drafted stipulated dismissal of Lakewood police officers. (0.5 hours waived)	0.50	\$265.00	\$0.00
02/23/2018	Donald Screen	Conference with M. Brown regarding strategy for settling with library, dismissal of officers. (0.2 hours waived)	0.20	\$500.00	\$0.00
02/23/2018	Subodh Chandra	Edit stipulated dismissal and circulate among counsel. Review and note concurrences from counsel for City, individual officers, officer Jones; still waiting for response from library's counsel. Analyze and consider report from A. Sletvold regarding observations from videos of interviews of clients performed by officers not properly previously produced in response to public-records requests.	0.30	\$500.00	\$150.00

03/01/2018	Ashlie Sletvold	Review/revise library settlement. (1.3 hours waived)	1.30	\$400.00	\$0.00
03/02/2018	Marvin Brown	Filed stipulated notice of dismissal; spoke with Medicaid about issuing a final lien amount. (0.3 hours waived)	0.60	\$265.00	\$79.50
03/13/2018	Subodh Chandra	Continued internal strategic discussions on minimizing reimbursement to Medicaid. Respond to C. O'Sullivan's email regarding status of settlement with Lakewood Public Library and leave a message for him. Edit draft settlement agreement with Lakewood Library. Direct and review research regarding Medicaid set-off implications. Call with clients re: settlement strategy. (0.4 hours waived)	0.40	\$500.00	\$0.00
03/16/2018	Subodh Chandra	Discussions with M. Brown regarding Medicaid update on dollars expected by Medicaid program from case resolutions.	0.20	\$500.00	\$100.00
03/16/2018	Marvin Brown	Drafted letter to ODM memorializing conversation about lien amount; discussion with S. Chandra re: same. (0.5 hours waived)	1.00	\$265.00	\$132.50
04/03/2018	Subodh Chandra	Review 3/28 response email from J. Climer re launching settlement dialogue and respond to same.	0.10	\$500.00	\$50.00
04/04/2018	Thomas Lindeman	Review discovery responses and draft deficiency letter. (3.5 hours waived)	3.50	\$150.00	\$0.00
04/18/2018	Subodh Chandra	Tel. call with J.G. Consider same. Mediation/settlement correspondence to opposing counsel J. Climer, et al. Settlement communications with Library's lawyer, C. O'Sullivan. (0.4 hours waived)	0.40	\$500.00	\$0.00
05/02/2018	Thomas Lindeman	Review discovery requests, begin response to rogs and RFAs. (0.8 hours waived)	0.80	\$150.00	\$0.00
05/03/2018	Thomas Lindeman	Phone call with SC, review, and edit deficiency letter. (0.6 hours waived)	0.60	\$150.00	\$0.00
05/07/2018	Thomas Lindeman	RFA and rog drafting. (1 hour waived)	1.00	\$150.00	\$0.00
05/08/2018	Subodh Chandra	Communications with T. Lindeman about discovery compliance and current edits to discovery-deficiency letter to Officer Jones. (0.2 hours waived)	0.20	\$500.00	\$0.00
05/09/2018	Subodh Chandra	Finalize discovery-deficiency letter to counsel for Officer Jones and delegate tasks regarding same. Review draft discovery responses to defense requests. Review settlement communication from C. O'Sullivan for Lakewood Library. Study and discuss Rule 68 offer of judgment from Defendant City.	0.80	\$500.00	\$200.00

		Communications with and tel. call with clients. (0.4 hours waived)			
05/09/2018	Thomas Lindeman	draft discovery responses and send to SC. (3.5 hours waived)	3.50	\$150.00	\$0.00
05/24/2018	Subodh Chandra	Attention to email from library's counsel. (0.1 hours waived)	0.10	\$500.00	\$0.00
05/29/2018	Patrick Haney	Prepare notice of counsel substitution. (0.3 hours waived)	0.30	\$295.00	\$0.00
05/29/2018	Subodh Chandra	Revise Library settlement agreement release language that C. O'Sullivan offered after discussion with A. Sletvold. Transmit same to C. O'Sullivan. (0.3 hours waived)	0.30	\$500.00	\$0.00
05/29/2018	Ashlie Sletvold	Discussion with S. Chandra regarding remaining disputed language in draft settlement agreement with library. (0.3 hours waived)	0.30	\$400.00	\$0.00
05/30/2018	Ashlie Sletvold	Review and provide comments regarding draft discovery responses; discussion with S. Chandra regarding same.	1.90	\$400.00	\$760.00
05/30/2018	Subodh Chandra	Strategy work with A. Sletvold on responses to Defendants' discovery requests.	1.10	\$500.00	\$550.00
05/31/2018	Ashlie Sletvold	Review/revise draft interrogatory responses for J.G. and D.J.; message to S. Chandra regarding finalizing same and plan to complete production responses.	1.20	\$400.00	\$480.00
06/03/2018	Ashlie Sletvold	Review/revise draft responses to production requests; message to S. Chandra regarding same.	1.10	\$400.00	\$440.00
06/18/2018	Subodh Chandra	Further discovery planning and delegation.	0.30	\$500.00	\$150.00
06/19/2018	Ashlie Sletvold	Review email from S. Chandra regarding outstanding discovery tasks. Formulate plan to complete.	0.30	\$400.00	\$120.00
06/25/2018	Ashlie Sletvold	Discussion with P. Kabat regarding plans to transition M. Brown duties on matter; discussion with J. Climer about further attempt to resolve before further resources are expended.	0.20	\$400.00	\$80.00
06/26/2018	Subodh Chandra	Communications from Library's counsel re settlement and communications with co- counsel re settlement discussions. (0.2 hours waived)	0.20	\$500.00	\$0.00
06/29/2018	Subodh Chandra	Communications with A. Sletvold regarding settlement/mediation discussions posture, last demand, strategy for resolution.	0.10	\$500.00	\$50.00

07/03/2018	Ashlie Sletvold	Review offer of judgment and email correspondence regarding last demand; call with T. Gray regarding settlement; update S. Chandra on status; call with clients for authority; deliver settlement proposal.	0.80	\$400.00	\$320.00
07/11/2018	Ashlie Sletvold	Call with J.G. re status; call with T. Gray regarding settlement negotiations.	0.20	\$400.00	\$80.00
07/17/2018	Ashlie Sletvold	Return call T. Gray.	0.10	\$400.00	\$40.00
07/18/2018	Ashlie Sletvold	Return call to T. Gray.	0.10	\$400.00	\$40.00
07/23/2018	Ashlie Sletvold	Call with T. Gray.	0.10	\$400.00	\$40.00
07/24/2018	Ashlie Sletvold	Review offer of judgment; contact clients to discuss proposal; prepare notice of acceptance per approval from clients; draft stipulated dismissal with prejudice of individual officers; draft stipulated dismissal with prejudice of library; draft notice of filing offer and acceptance and request for clerk to enter judgment; communicate with staff re filing protocol; deliver notice of acceptance and proposed stipulated dismissals to defense counsel. (1.2 hours waived)	1.20	\$400.00	\$0.00
07/30/2018	Ashlie Sletvold	Call to Library counsel for consent to file dismissals; send follow-up email; direct paralegal regarding filing stipulated dismissals with prejudice. (0.3 hours waived)	0.30	\$400.00	\$0.00

**Line Item Discount Subtotal**      **-\$27,284.00**

**Subtotal**      **\$42,879.50**

**Total**      **\$42,879.50**

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1169	08/16/2018	\$6,278.07	\$0.00	\$6,278.07

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
----------------	--------	------------	-------------------	-------------

1175	08/21/2018	\$42,879.50	\$0.00	\$42,879.50
				<b>Outstanding Balance</b>
				<b>\$49,157.57</b>
				<b>Total Amount Outstanding</b>
				<b>\$49,157.57</b>